

Filed Under Seal

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 13-206
v.	:	DATE FILED: April 25, 2013
CHRISTIAN DIOR WOMACK,	:	VIOLATIONS:
a/k/a "Gucci Prada,"	:	18 U.S.C. § 1591 (sex trafficking of
RASHIDAH BRICE,	:	a minor or by force - 1 count);
a/k/a "Camille,"	:	18 U.S.C. § 1591 (sex trafficking by
a/k/a "Milly"	:	force - 2 counts);
	:	18 U.S.C. § 1594(a) (attempt)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, defendants CHRISTIAN DIOR WOMACK, a/k/a "Gucci Prada," and RASHIDAH BRICE, a/k/a "Camille," a/k/a "Milly," were the operators of a prostitution venture in Philadelphia, Pennsylvania, and elsewhere.
2. As part of this venture, defendants CHRISTIAN DIOR WOMACK, a/k/a "Gucci Prada," and RASHIDAH BRICE, a/k/a "Camille," a/k/a "Milly," recruited young females to work as prostitutes for them. Defendants CHRISTIAN DIOR WOMACK, a/k/a "Gucci Prada," and RASHIDAH BRICE, a/k/a "Camille," a/k/a "Milly," engaged in acts of physical violence and threats of physical harm to maintain the participation of females in their prostitution business.
3. As part of this venture, defendants CHRISTIAN DIOR WOMACK, a/k/a "Gucci Prada," and RASHIDAH BRICE, a/k/a "Camille," a/k/a "Milly," created Internet

advertisements in which they advertised these females as available for purchase for purposes of prostitution. The advertisements featured pictures of the females scantily clad, and provided a phone number to call to arrange a meeting with the females.

4. Between on or about May 25, 2012, through on or about June 11, 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

**CHRISTIAN DIOR WOMACK,
a/k/a "Gucci Prada," and
RASHIDAH BRICE,
a/k/a "Camille,"
a/k/a "Milly,"**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Minor 1, whose identity is known to the Grand Jury, and benefitted financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Minor 1, and attempted to do so. At the time that defendants CHRISTIAN DIOR WOMACK and RASHIDAH BRICE did this, they knew and acted in reckless disregard of the fact that Minor 1 had not reached the age of 18 and would be caused to engage in commercial sex acts, and that force, threats of force, fraud, coercion, and any combination of such means would be used to cause Minor 1 to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1591 and 1594(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 3 of Count One are incorporated by reference.
2. Between on or about June 26, 2012, through on or about July 2, 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

**CHRISTIAN DIOR WOMACK,
a/k/a "Gucci Prada," and
RASHIDAH BRICE,
a/k/a "Camille,"
a/k/a "Milly,"**

in and affecting interstate commerce, knowingly attempted to recruit, entice, harbor, transport, provide, obtain, and maintain Person 2, whose identity is known to the Grand Jury, and attempted to benefit financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Person 2. At the time that defendants CHRISTIAN DIOR WOMACK and RASHIDAH BRICE did this, they knew and acted in reckless disregard of the fact that force, threats of force, fraud, coercion, and any combination of such means would be used to attempt to cause Person 2 to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1591 and 1594(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 3 of Count One are incorporated by reference.
2. Between on or about February 1, 2013, through on or about February 3, 2013, in the Eastern District of Pennsylvania and elsewhere, defendant

**CHRISTIAN DIOR WOMACK,
a/k/a "Gucci Prada," and
RASHIDAH BRICE,
a/k/a "Camille,"
a/k/a "Milly,"**

in and affecting interstate commerce, knowingly attempted to recruit, entice, harbor, transport, provide, obtain, and maintain Person 3, whose identity is known to the Grand Jury, and attempted to benefit financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Person 3. At the time that defendants CHRISTIAN DIOR WOMACK and RASHIDAH BRICE did this, they knew and acted in reckless disregard of the fact that force, threats of force, fraud, coercion, and any combination of such means would be used to attempt to cause Person 3 to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1591 and 1594(a).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1591, set forth in this Indictment, defendants

**CHRISTIAN DIOR WOMACK,
a/k/a "Gucci Prada," and
RASHIDAH BRICE,
a/k/a "Camille,"
a/k/a "Milly,"**

shall forfeit to the United States of America:

(a) any property, real or personal, used or intended to be used to commit, or to facilitate the commission of such violations; and

(b) any property, real or personal, constituting or derived from, any proceeds obtained directly or indirectly as a result of such violations.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

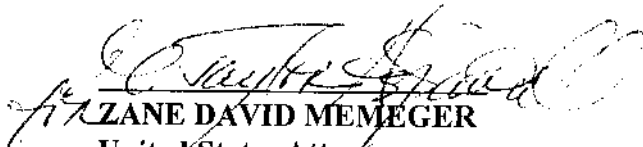
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Sections 1594(d) and (e).

A TRUE BILL:

FOREPERSON


ZANE DAVID MEMEGER
United States Attorney